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TIMOTHY B. FLEMING
OF COUNSEL

February 28, 2020

Via ECF and Federal Express

The Honorable George B. Daniels
UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: *In re: Terrorist Attacks on September 11, 2001*, 03-md-01570 (GBD)(SN)
Havlish, et al. v. bin Laden, et al., 1:03-cv-9848 (GBD)(FM)
Request to File Judgment Enforcement Motion Under Seal**

Dear Judge Daniels:

The Havlish Plaintiffs hereby request permission to file under seal a motion relating to enforcement of the *Havlish* Final Order And Judgment dated October 16, 2012. *Havlish* Doc. No. 317, MDL Doc. No. 2624. Because the Motion concerns information that is sensitive and confidential, and, if placed on the public document, may inhibit Plaintiffs' purpose in attempting to enforce their judgment, Plaintiffs request to file such Motion under seal, and further request that the Court's order, if one is issued, be entered and placed under seal as well, and be delivered only to *Havlish* Plaintiffs' counsel. A courtesy copy of this letter, along with copies of the motion, memorandum, and proposed order that are proposed to be placed under seal, will be sent to Your Honor's chambers by Federal Express.

Respectfully,



Timothy B. Fleming
One of the Havlish Attorneys

SO ORDERED.

Date: _____
New York, New York

GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

BIRMINGHAM, AL
DELAND, FL
NASHVILLE, TN
WASHINGTON, D.C.